

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ARBUTUS BIOPHARMA CORPORATION)
and GENEVANT SCIENCES GmbH,)
)
Plaintiffs,)
)
v.) C.A. No. 22-252 (JDW)
)
MODERNA, INC. and MODERNATX, INC.)
)
Defendants.)
MODERNA, INC. and MODERNATX, INC.,)
)
Counterclaim-Plaintiffs,)
)
v.)
)
ARBUTUS BIOPHARMA CORPORATION)
and GENEVANT SCIENCES GmbH,)
)
Counterclaim-Defendants.)

**PLAINTIFFS' UNOPPOSED MOTION TO
SEAL PORTIONS OF DAUBERT BRIEFING**

Pursuant to the Protective Order (D.I. 91) as modified by the Court's November 14, 2023 Order (D.I. 155), and the Court's July 28, 2025 Order (D.I. 503), Plaintiffs respectfully move this Court to seal their sensitive and confidential information and to grant leave to file partially redacted versions of the following documents:

1. Plaintiffs' Nov. 7, 2025, Opening Brief in Support of Motion to Exclude Expert Testimony;
2. Moderna's Nov. 7, 2025, Opposition to Plaintiffs' Motion to Exclude Expert Testimony;

3. Plaintiffs' Nov. 21, 2025, Reply Brief in Support of Motion to Exclude Expert Testimony;
4. Moderna's Nov. 21, 2025, Memorandum in Support of Moderna's *Daubert* Motion;
5. Plaintiffs' Dec. 5, 2025, Opposition Brief to Moderna's *Daubert* Motion;
6. Moderna's Dec. 5, 2025, Reply Brief in support of Moderna's *Daubert* Motion;
7. Exhibit 1
8. Exhibit 3
9. Exhibit 5
10. Exhibit 13
11. Exhibit 14
12. Exhibit 31
13. Exhibit 36
14. Exhibit 33
15. Exhibit 37
16. Exhibit 38
17. Exhibit A
18. Exhibit C
19. Exhibit D
20. Exhibit R
21. Exhibit S
22. Exhibit V

Plaintiffs seek leave to file under seal Exhibit 12.

The parties' motion, supporting papers, and the exhibits thereto, redact for Plaintiffs' confidential information. The grounds for this motion are set forth in Plaintiffs' brief in support

of this motion, together with the declaration of Pete Zorn, attached as Exhibit A. Pursuant to Section I.D.2 of the Court's Policies and Procedures, highlighting has been applied to the sealed version of the documents identified above.

Pursuant to D. Del. LR 7.1.1, counsel certifies that the parties met and conferred, and Moderna does not oppose this motion.

Plaintiffs respectfully request that the Court grant their motion and enter the enclosed order granting leave to file redacted versions of the documents identified above.

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